

# Exhibit A

Appendix XII-B1

	<b>CIVIL CASE INFORMATION STATEMENT (CIS)</b>		<b>FOR USE BY CLERK'S OFFICE ONLY</b> <b>PAYMENT TYPE:</b> <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA <b>CHG/CK NO.:</b> <b>AMOUNT:</b> <b>OVERPAYMENT:</b> <b>BATCH NUMBER:</b>
	<b>Use for initial Law Division</b> <b>Civil Part pleadings (not motions) under Rule 4:5-1</b> <b>Pleading will be rejected for filing, under Rule 1:5-6(c),</b> <b>if information above the black bar is not completed</b> <b>or attorney's signature is not affixed</b>		
<b>ATTORNEY / PRO SE NAME</b> Jay L. Solnick, Esquire		<b>TELEPHONE NUMBER</b> (215) 481-9979	<b>COUNTY OF VENUE</b>
<b>FIRM NAME</b> (if applicable) Solnick & Associates, LLC		<b>DOCKET NUMBER</b> (when available)	
<b>OFFICE ADDRESS</b> 2851 Limekiln Pike Glenside, PA 19038		<b>DOCUMENT TYPE</b> Complaint	
		<b>JURY DEMAND</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> No	
<b>NAME OF PARTY</b> (e.g., John Doe, Plaintiff) Wally Euisuk Hwang		<b>CAPTION</b> Wally Euisuk Hwang and Jung Ha Hwang v. Lawrence Dodd, et al	
<b>CASE TYPE NUMBER</b> (See reverse side for listing) 603	<b>HURRICANE SANDY RELATED?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<b>IS THIS A PROFESSIONAL MALPRACTICE CASE?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.</b>	
<b>RELATED CASES PENDING?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		<b>IF YES, LIST DOCKET NUMBERS</b>	
<b>DO YOU ANTICIPATE ADDING ANY PARTIES</b> (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		<b>NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY</b> (if known) <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
<b>CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION</b>			
<b>DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP?</b> <input type="checkbox"/> YES <input checked="" type="checkbox"/> No	<b>IF YES, IS THAT RELATIONSHIP:</b> <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
<b>DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<b>USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION</b>			
<b>Do you or your client need any disability accommodations?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<b>If yes, please identify the requested accommodation</b>	
<b>Will an interpreter be needed?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>If yes, for what language?</b> Korean	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
<b>ATTORNEY SIGNATURE:</b> 			

**JAY L. SOLNICK, ESQUIRE  
ATTORNEY I.D.: 05635-1994  
SOLNICK & ASSOCIATES, LLC  
2851 LIMEKILN PIKE  
GLENSIDE, PA 19038  
(215) 481-9979**

## ATTORNEY FOR PLAINTIFFS

**WALLY EUISUK HWANG**  
**225 East Manoa Road**  
**Havertown, PA 19083**  
and  
**JUNG HA HWANG**  
**225 East Manoa Road**  
**Havertown, PA 19083**

## Plaintiffs

V.

**LAWRENCE DODD**  
**2129 North 77th Drive**  
**Phoenix, AZ 85035**  
**and**  
**DODD TRUCKING LLC**  
**2129 North 77th Drive**  
**Phoenix, AZ 85035**  
**and**  
**DOLPHIN TRUCKING CORP**  
**14905 S. Woodcrest Avenue**  
**Homer Glen, IL 60491**  
**and**  
**TETYANA PAVLENKO**  
**14905 S. Woodcrest Avenue**  
**Homer Glen, IL 60491**

## Defendants

Plaintiffs, Wally Euisuk Hwang and Jung Ha Hwang, by and through undersigned counsel, in support of his Complaint, states the following:

**COUNT I**

1. Plaintiff, Wally Euisuk Hwang, is an adult individual who currently resides at the address indicated in the above caption.

2. Plaintiff, Jung Ha Hwang, is an adult individual who currently resides at the address indicated in the above caption.

3. Defendant, Lawrence Dodd, is an adult individual who is believed to reside at the address indicated in the above caption.

4. Defendant, Dodd Trucking LLC, is, upon information and belief, a business entity organized and existing under the laws of the state of Arizona with offices and/or a place of business at the address indicated in the above caption.

5. Defendant, Dolphin Trucking Corp, is, upon information and belief, a business entity organized and existing under the laws of the state of Illinois with offices and/or a place of business at the address indicated in the above caption.

6. Defendant, Tetyana Pavlenko, is an adult individual who currently resides and/conducts business at the address indicated in the above caption.

7. At the time of the subject incident as described herein, Defendant, Lawrence Dodd, was employed by and/or acting as the agent for Defendant, Dodd Trucking LLC, Defendant, Dodd Trucking LLC, and/or Defendant, Tetyana Pavlenko, acting within the course and scope of his employment and/or agency.

8. On September 26, 2020, at approximately 12:40 PM, Plaintiff, Wally Euisuk Hwang, was the operator, and Plaintiff, Jung Ha Hwang, the passenger, of a motor vehicle stopped in the parking lot of the Thomas Edison Service Area on the New Jersey Turnpike in Woodbridge Township NJ, when suddenly and without warning, Plaintiffs' vehicle was violently struck by a tractor-trailer operated by Defendant, Lawrence Dodd.

8. The foregoing accident and all of the injuries and damages set forth herein after sustained by Plaintiff, Wally Euisuk Hwang, were the direct and proximate result of the negligent and careless manner in which Defendant, Lawrence Dodd, operated his vehicle.

9. As a result of the foregoing incident, Plaintiff, Wally Euisuk Hwang, sustained painful and severe injuries which include, but are not limited to disc herniation at L4-5, disc protrusion at L3-4 with annular tear, disc protrusion with annular tear at L5-S1, disc protrusion at L2-3 and L1-2 with peripheral annular tear at the L2-3 level, cervicalgia, sciatica, lumbar sprain/strain.

10. As a result of the foregoing incident, Plaintiff, Wally Euisuk Hwang, suffered and continues to be plagued by persistent pain and limitation, and therefore, avers that his injuries may be of a permanent nature, causing residual problems for the remainder of his lifetime.

11. As a result of the foregoing accident, Plaintiff, Wally Euisuk Hwang, has suffered physical pain, mental anguish, and loss of enjoyment of life.

12. As a result of the foregoing accident, Plaintiff, Wally Euisuk Hwang, has had to undergo otherwise unnecessary medical treatment and has incurred unreimbursed medical expenses.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Lawrence Dodd, for injuries and damages plus interest and costs of suit.

#### **COUNT II**

1. Plaintiffs hereby incorporate the allegations of Count I of this Complaint as though fully set forth at length.

2. As a result of the foregoing incident, Plaintiff, Jung Ha Hwang, sustained painful and severe injuries which include, but are not limited to cervicalgia, lumbar radiculopathy, sprain and strain of the cervical spine, thoracic spine and lumbar spine, left ankle injury.

3. As a result of the foregoing incident, Plaintiff, Jung Ha Hwang, suffered and continues to be plagued by persistent pain and limitation, and therefore, avers that her injuries may be of a permanent nature, causing residual problems for the remainder of her lifetime.

4. As a result of the foregoing accident, Plaintiff, Jung Ha Hwang, has suffered physical pain, mental anguish, and loss of enjoyment of life.

5. As a result of the foregoing accident, Plaintiff, Jung Ha Hwang, has had to undergo otherwise unnecessary medical treatment and has incurred unreimbursed medical expenses.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Lawrence Dodd, for injuries and damages plus interest and costs of suit.

### **COUNT III**

1. Plaintiffs hereby incorporate the allegations of Counts I and II of this Complaint as though fully set forth at length.

2. Defendant, Dodd Trucking LLC, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Dodd Trucking LLC, for injuries and damages plus interest and costs of suit.

### **COUNT IV**

1. Plaintiffs hereby incorporate the allegations of Counts I, II and III of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Dodd Trucking LLC, for injuries and damages plus interest and costs of suit.

**COUNT V**

1. Plaintiffs hereby incorporate the allegations of Counts I through IV of this Complaint as though fully set forth at length.

2. Defendant, Dolphin Trucking Corp, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Dolphin Trucking Corp, for injuries and damages plus interest and costs of suit.

**COUNT VI**

1. Plaintiffs hereby incorporate the allegations of Counts I through V of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Dolphin Trucking Corp, for injuries and damages plus interest and costs of suit.

**COUNT VII**

1. Plaintiffs hereby incorporate the allegations of Counts I through VI of this Complaint as though fully set forth at length.

2. Defendant, Tetyana Pavlenko, is vicariously liable for the injuries and damages sustained by Plaintiffs as more fully set forth herein.

WHEREFORE, Plaintiff, Wally Euisuk Hwang, demands judgment against Defendant, Tetyana Pavlenko, for injuries and damages plus interest and costs of suit.

**COUNT VIII**

1. Plaintiffs hereby incorporate the allegations of Counts I through VII of this Complaint as though fully set forth at length.

WHEREFORE, Plaintiff, Jung Ha Hwang, demands judgment against Defendant, Tetyana Pavlenko, for injuries and damages plus interest and costs of suit.

**JURY DEMAND**

Plaintiffs demand a trial by jury.

**DESIGNATION OF TRIAL COUNSEL**

Jay L. Solnick, Esquire is hereby designated trial counsel for Plaintiffs relative to the above-captioned matter.

**CERTIFICATION**

I certify that the matter in controversy is not the subject of any other action or arbitration hearing, now or contemplated, and that no other parties need be joined in this action.

**SOLNICK & ASSOCIATES, LLC**

By:   
**JAY L. SOLNICK, ESQUIRE**  
Attorney for Plaintiffs



# Civil Case Information Statement

## Case Details: MIDDLESEX | Civil Part Docket# L-004280-22

**Case Caption:** HWANG WALLY VS DODD LAWRENCE

**Case Initiation Date:** 08/25/2022

**Attorney Name:** JAY L SOLNICK

**Firm Name:** SOLNICK & ASSOCIATES, LLC

**Address:** 2851 LIMEKILN PIKE

GLENDALE PA 19038

**Phone:** 2154819979

**Name of Party:** PLAINTIFF : Hwang, Wally, E

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: Wally E Hwang?** NO

**Are sexual abuse claims alleged by: Jung H Hwang?** NO

## THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** YES

**If yes, for what language:**

KOREAN,KOREAN

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

08/25/2022

Dated

/s/ JAY L SOLNICK

Signed

